

**REMARKS**

The Office Action mailed November 16, 2006 has been carefully considered. Reconsideration in view of the following remarks is respectfully requested.

**Art Rejection(s) Under 35 U.S.C. §§ 102 and 103**

Claims 1-10 were stand rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Pierre (U.S. pat. no. 7,000,245). Claims 11-13 were rejected under 35 U.S.C. § 103(a) as unpatentable over Pierre (U.S. pat. no. 7,000,245). Applicants respectfully traverse.

The present invention employs a multi-stage list structure in which the distribution list and the link list are associated with each other through the link names which are respectively included in these lists. Moreover, in the present invention, the correspondence between the link name and the video data file name in the link list is not fixed; rather the video data file name in the link is updated depending on distribution conditions. As a result, by updating the video data file name corresponding to the link name in the link list, even if the distribution list has been determined (generated), it is possible to easily replace video data which is to be distributed (updated) without any restriction on locations where video data are stored. In other words, the present invention can update video data stored in a given location to another video data which is stored in a different location from the given location.

In contrast, the carousel of *Pierre* includes a data object itself, a reference to a data object, an indication, a flag, a reference to another carousel, etc. Moreover, for data objects that would be obsolete if not immediately consumed, *Pierre* transmits a carousel including a reference to a data object to the receiving station, instead of transmitting a carousel including the data object itself to the receiving station, and when a program is actually presented to a user, a current version of the data object is obtained from the location designated by the reference, and the program is then played back at the receiving station.

It may be possible in *Pierre* to change the contents of a data object to a current version thereof after transmitting a carousel to the receiving station. However, unlike the present invention, *Pierre* does not employ a multi-stage list structure in which a distribution list and a

link list are associated with each other through link names included therein. As a result, in *Pierre*, once the contents of the carousel have been determined (generated), the location designated by the carousel is fixed. Thus, such a structure employed by *Pierre* cannot provide the foregoing advantageous effect of the present invention.

The distribution list of the present invention includes a link name that links to video data as a distribution request destination. Regarding this limitation, the Examiner asserts “the identifier that identifies particular data objects in stream of data objects” (page 3, 1<sup>st</sup> paragraph, last three lines of the Office Action). However, column 5, line 41 to column 6, line 30 of *Pierre* pointed out by the Examiner merely disclose that version numbers for identifying that updates have been made to particular data objects and flags for identifying particular data objects which need to be cached by a receiver are inserted into a data stream (column 5, line 66 to column 6, line 2). Moreover, even if the version numbers and the flags of *Pierre* were a kind of identifier that identifies a particular data object from among the data objects inserted into the data stream, it is merely possible to identify updated data objects and data objects that need to be cached. Thus, they are different from the link name as the distribution request destination of the present invention.

In the present invention, the link list is a correspondence list between a link name and a video data file name, and link names are included in both the distribution list and the link list. Regarding this limitation, the Examiner asserts “a ‘file table or directory’ which shows the correspondence between the data objects and their file names” (page 3, 2<sup>nd</sup> paragraph of the Office Action). However, even if the ‘file table or directory’ shown the correspondence between the data objects and their file names as asserted by the Examiner, this merely implies the correspondence between video data and a video data file name, and does not teach the link list of the present invention which shows the correspondence between the link name as the distribution request destination and the video data file name.

Moreover, regarding the ‘file table or directory’, *Pierre* discloses that: it identifies data objects forming a program and can be used by a receiver to parse and store the data objects and to retrieve the data objects when the program is replayed (column 3, lines 18-22); it is included in a

data stream or carousel information 20 corresponding to the data objects of the program, and is not found in programs intended for immediate consumption (column 3, lines 38-40 and column 5, lines 46-52); it is stored as files on a storage device such as a mass storage device 16 in FIG. 1 connected to a receiving station 14 (column 3, lines 43-44); and it is stored to access files on demand and is not needed for immediate consumption of the program (column 7, lines 56-60). As such, the 'file table or directory' of *Pierre* merely designates that a particular data object corresponds to which portion in a program, and it is merely used in the case in which a program not immediately consumed is stored in a mass storage device at a receiving station and the program is then played back, i.e., in the case in which data objects are stored in files on the mass storage device, and the data objects are read from the files on the mass storage device at the time of playing back the program. Moreover, the 'file table or directory' of *Pierre* is transmitted from the broadcast station to the receiving station. Therefore, unlike the link list of the present invention, a video distribution system cannot update the contents of the 'file table or directory' of *Pierre*.

In addition, as described above, the portions of *Pierre* pointed out by the Examiner regarding the link name in the distribution list merely disclose the version number and the flags. On the other hand, regarding the link of the present invention, the Examiner merely points out the 'file table or directory' which shows the correspondence between the data objects and their file names. The Examiner makes no mention as to whether the 'file table or directory' includes version numbers and flags similar to those inserted in the data stream. As a matter of fact, *Pierre* does not disclose such a technical matter. Therefore, even if the version numbers and the flags of *Pierre* corresponded to the link name of the present invention, *Pierre* does not disclose the technical idea of incorporating link names into both the distribution list and the link list to correlate these lists.

Regarding the link list updating device, the Examiner asserts that a broadcast station 12 updates the data stored in files, which need to have current data, and that new live data corresponding to the reference/indication is obtained (page 3, 3<sup>rd</sup> paragraph to page 4, 1<sup>st</sup> paragraph of the Office Action). However, as described above, the Examiner points out the 'file table or directory' of *Pierre* regarding the link list of the present invention. There is no

association between the matters asserted by the Examiner regarding the link list updating device with the updating of the 'file table or directory'.

Moreover, the present invention updates a video data file name corresponding to a link name in a link list to another video data file name. *Pierre* does not disclose updating the contents of the 'file table or directory', which, according to the assertion by the Examiner, corresponds to the link list of the present invention. Therefore, *Pierre* also does not disclose updating the contents of the 'file table or directory' so as to replace a file name of a data object at the time of recording a program with a file name of a different kind of data object.

Furthermore, indication/reference of *Pierre* are merely used for updating the contents of data objects that would be obsolete if not immediately consumed so that they include current versions. The data object designated by the indication/reference is not changed, but they always designate the same data object. Thus, *Pierre* does not disclose updating the indication/reference so that they designate a different data object from a data object presently designated.

#### **Newly-Added Claims**

Claims 14-43 have been added to further particularly point out and distinctly claim the subject matter regarded as the invention.

#### **Conclusion**


In view of the preceding discussion, Applicants respectfully urge that the claims of the present application define patentable subject matter and should be passed to allowance.

If the Examiner believes that a telephone call would help advance prosecution of the present invention, the Examiner is kindly invited to call the undersigned attorney at the number below.

Please charge any additional required fees, including those necessary to obtain extensions of time to render timely the filing of the instant Amendment and/or Reply to Office Action, or credit any overpayment not otherwise credited, to our deposit account no. 50-1698.

Respectfully submitted,  
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